FINDING OF NO SIGNIFICANT IMPACT
IMPLEMENTATION OF A 30MW PV SOLAR FACILITY
AT
FORT BENNING, GEORGIA

1. INTRODUCTION

An Environmental Assessment (EA) was prepared to identify and evaluate potential environmental effects of the implementation of a 30MW photovoltaic (PV) solar facility at Fort Benning. In August 2012, the Assistant Secretary of the Army (Installations, Energy and Environment) established an energy goal attainment policy for all Active Army Installations. These goals relate to energy intensity reduction and implementing renewable energy projects at each Army Installation. Under the Proposed Action, Georgia Power will design, construct, operate, and maintain of 30MW Solar PV Facility within the boundaries of Fort Benning. An EA was prepared in accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) Regulations at 40 Code of Federal Regulations (CFR) Parts 1500-1508, and the Army NEPA Regulation at 32 CFR Part 651 (*Environmental Analysis of Army Actions*).

2. PURPOSE AND NEED

The need of the Proposed Action is to: (a) achieve renewable energy production on Army land in accordance with the *Energy Performance Goal and Master Plan for the Department of Defense* (10 USC 2911[e]), as amended, which requires that the Army produce or procure not less than 25 percent (%) of the total quantity of facility energy it consumes within its facilities during fiscal year 2025 and each fiscal year thereafter from renewable energy sources; (b) contribute to the Army's goal of generating 1 gigawatt (GW) of renewable electrical energy on Army land by 2025; and (c) contribute to compliance with the Energy Policy Act (EPAct) of 2005 requiring the Army's consumption of not less than 7.5% of the total quantity of facility electrical energy it consumes within its facilities during fiscal year 2013 and each fiscal year thereafter from renewable energy sources.

3. DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

Proposed Action: The Army proposes to enter a 35 year Utilities Easement, of approximately 250 acres to be located within the Fort Benning installation boundary, with Georgia Power. Georgia Power will design, construct, operate, and maintain a 30MW solar PV System. A PV System is an arrangement of components designed to produce electric power using sunlight as a power source. The power-producing components of the PV System consist of a series of networked solar arrays, often called an array field. The Army is expected to consume a minimum of 51% of this power through the existing General Services Administration (GSA) Areawide Contract with Georgia Power.

Alternatives Considered and Evaluated: The NEPA, CEQ, and the Army NEPA Regulation require a range of reasonable alternatives to be considered and evaluated. The Army used screening criteria to determine which Alternatives were reasonable. Based on the screening criteria discussed in the EA, three proposed action Alternatives were analyzed:

- **Alternative 1 (Dove Field Site – Preferred Alternative)**: This Alternative allows for production of 30MWs of solar PV arrays on approximately 250 acres located within training area W04 and the northern half of W05. This site is a contiguous parcel of land located immediately to the north of the Georgia Power Alabama Side Substation (GPASS) near the western boundary of Fort Benning within Russell County, Alabama.

- **Alternative 2 (Molnar Site)**: This Alternative allows for production of 30MWs of solar PV arrays on approximately 250 acres within training areas Z04. This is a mostly contiguous parcel located within Russell County, Alabama.

- **Alternative 3 (Landfill Site)**: This Alternative allows for the production of 30MWs of solar PV arrays on 250 acres located within training area P04 on the north side of Martha Berry State Highway (US27/280).

In addition to the three proposed action Alternatives, a No Action Alternative was also considered. Under the No Action Alternative, the Army would not enter into a utilities easement agreement with Georgia Power to design, construct, operate, and maintain a 30MW solar PV generation system on Fort Benning. While the No Action Alternative would not satisfy the purpose and need of the proposed action, the No Action Alternative reflects the *status quo*, and serves as a benchmark against which the Action Alternatives were evaluated.

4. ANTICIPATED ENVIRONMENTAL EFFECTS

The analysis in the EA provides a description of the existing environmental and socioeconomic conditions of the Alternatives being considered, and evaluates any individual or cumulative environmental and socioeconomic changes likely to result from the implementation of the Action Alternatives. Table 1 provides a summation of the anticipated environmental effects of all of the Action Alternatives, as well as the No Action Alternative.

After finalization of the EA, it was discovered by Fort Benning personnel that some areas within the site analyzed for the Preferred Alternative (Alternative 1 – Dove Field site), exhibited characteristics typical of wetlands. During the completion of this FNSI, the United States Corps of Engineers is making a determination if these areas are to be considered as jurisdictional wetlands. If so, the project will incorporate any required wetland permitting and/or wetland mitigation if wetland impacts cannot be avoided by design. In addition, a number of small streams were identified at the Alternative 1 site. Similar to wetlands, if disturbance to these areas is deemed unavoidable, the appropriate stream buffer variance will be obtained. Soil erosion and sedimentation controls will be put in place, per the Clean Water Act, NPDES, and Alabama's Construction Best Management Practices Plan.

The EA analysis demonstrates that adherence to applicable Federal and State environmental laws, regulations, and permitting processes would minimize adverse environmental impacts resulting from implementation of any of the Proposed Action Alternatives. As such, potential wetland and stream impact do not constitute any significant adverse impact that would preclude the determination of a FNSI for this proposed action.

Table 1 : Comparison of the Potential Effects on the Evaluated Alternatives

VEC	NO ACTION ALTERNATIVE	ALTERNATIVE 1 (PREFERRED)	ALTERNATIVE 2	ALTERNATIVE 3
Land Use	No effects.	Short and Long Term Minor effects during construction, operation and maintenance of facility.	Short and Long Term Minor effects during construction, operation and maintenance of facility.	Short and Long Term Minor effects during construction, operation and maintenance of facility.
Air Quality	No effects.	Short Term potential Moderate to Significant, effect during construction. Effects would be reduced through ADEM and Clean Air Act requirements. No Long-Term air quality effects.	Short Term potential Moderate to Significant, effect during construction. Effects would be reduced through ADEM and Clean Air Act requirements. No Long-Term air quality effects.	Short Term potential Moderate to Significant, effect during construction. Effects would be reduced through GADNR and Clean Air Act requirements. No Long-Term air quality effects.
Noise	No effects.	Short Term, localized, Negligible effect during construction. No Long-Term noise effects.	Short Term, localized, Negligible effect during construction. No Long-Term noise effects.	Short Term, localized, Negligible effect during construction. No Long-Term noise effects.
Soils	No effects.	Short Term, Moderate adverse soils effects due to potential erosion during construction. Effects would be reduced through compliance with ADEM requirements.	Short Term, Moderate adverse soils effects due to potential erosion during construction. Effects would be reduced through compliance with ADEM requirements.	Short-Term, Moderate adverse soils effects due to potential erosion during construction. Effects would be reduced through compliance with GADNR requirements.
Water Resources	No effects.	Short Term, Minor adverse effects during construction, operation and maintenance. Effects would be reduced through compliance with ADEM and CWA Section 404 requirements.	Short Term, Minor adverse effects during construction, operation and maintenance. Effects would be reduced through compliance with ADEM and CWA Section 404 requirements.	Short Term, Minor adverse effects during construction, operation and maintenance. Effects would be reduced through compliance with GADNR and CWA Section 404 requirements.
Biological Resources	No effects	Short and Long Term Minor adverse effects due to loss of habitat for RCW future recruitment clusters. No effects on currently designated RCW partitions.	Short and Long Term Minor adverse effects due to loss of habitat for RCW future recruitment clusters. No effects on currently designated RCW partitions.	Short and Long Term Minor adverse effects due to potential impacts on RCW future recruitment clusters and one current cluster. No effects on currently designated RCW foraging habitat.
Cultural Resources	No effects.	No adverse effects during construction with mitigation. Mitigation measures proposed: avoidance by design.	No adverse effects during construction with mitigation. Mitigation measures proposed: avoidance by design.	No effects.

Socioeconomics (including Environmental Justice and Protection of Children)	No effects.	Short-Term positive impact for dollars being spent within the community. No effects to health and safety of children.	Short-Term positive impact for dollars being spent within the community. No effects to health and safety of children.	Short-Term positive impact for dollars being spent within the community. No effects to health and safety of children.
Utilities	No effects.	Short-Term, Negligible effect during construction and maintenance. Long-Term, Moderate beneficial effects during operation.	Short-Term, Negligible effect during construction and maintenance. Long-Term, Moderate beneficial effects during operation.	Short-Term, Negligible effect during construction and maintenance. Long-Term, Moderate beneficial effects during operation.
Transportation and Traffic	No effects.	Short and Long Term, localized, Negligible effect during construction, operation and maintenance.	Short and Long Term, localized, Negligible effect during construction, operation and maintenance.	Short and Long Term, localized, Negligible effect during construction, operation and maintenance.
Airspace	No effects.	Short and Long Term, Negligible effects during construction, operation and maintenance.	Short and Long Term, Negligible effects during construction, operation and maintenance.	Short and Long Term, Negligible effects during construction, operation and maintenance.
HTMW	No effects.	Short Term Minor adverse effects due to the potential for leaks of petroleum products related to construction. Long Term negligible effects during operation and maintenance.	Short Term Minor adverse effects due to the potential for leaks of petroleum products related to construction. Long Term negligible effects during operation and maintenance.	Short Term Minor adverse effects due to the potential for leaks of petroleum products related to construction. Long Term negligible effects during operation and maintenance.
Cumulative Effects	No effects.	No significant adverse cumulative effects.	No significant adverse cumulative effects.	No significant adverse cumulative effects.

5. PUBLIC REVIEW AND COMMENTS

The EA and a Draft Finding of No Significant Impact (FNSI) were made available to the public for a 30-day public comment period from July 24 – August 22, 2014. An announcement that these documents were available for public review was published via a Notice of Availability (NOA) in The Columbus Ledger-Enquirer, Fort Benning's The Bayonet and Saber, and The Tri-County Journal in accordance with the Army NEPA Regulation. The EA also identified The Stewart-Webster Journal Patriot Citizen as a publication source for the NOA. However, after finalization of the EA it was discovered that this publication no longer serves for legal notices for Chattahoochee County, and was not included for publication of the EA.

These documents were also available at several local libraries and are posted on the Fort Benning website at https://www.benning.army.mil/garrison/DPW/EMD/legal.htm. The NOA of the Final EA and Draft FNSI were also mailed to all agencies/individuals/organizations on the Fort

Benning NEPA distribution (mailing) list for the Proposed Action (see Section 8.0 of the EA). As part of Fort Benning's on-going, established process and dialogue with the Federally-recognized Native American Tribes affiliated with the Fort Benning area, the Army has provided each Tribe with a copy of these documents for consultation via review and comment.

Fort Benning received one comment during the 30-day public comment period from the Georgia Department of Natural Resources (GA DNR) Wildlife Resources Division. The letter addressed the known occurrences of natural communities, plants and animals of highest priority conservation status within a three mile radius of Alternative 3 (Landfill Site). In addition, GA DNR made recommendations that Fort Benning coordinate with the United States Fish and Wildlife Service (USFWS) on potential impacts to species of conservation concern, and advocated the use of stringent erosion control practices, as well as leaving a large riparian buffer of vegetation to protect water resources. As the preferred Alternative (Dove Field Site) to implement the proposed action is located in Russell County, Alabama, these concerns have been noted. Fort Benning will be coordinating with USFWS for potential impacts to Federally-listed species in Alabama, and will adhere to all applicable Federal, state, and Army regulations regarding erosion control and potential impacts to water resources. Therefore, there are no apparent issues that would affect the Final EA's analysis or the decision of a FNSI.

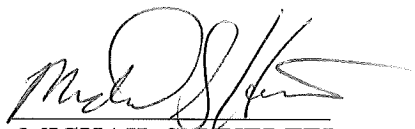
6. FINDING OF NO SIGNIFICANT IMPACT

I have considered the results of the analysis in the EA, comments received within the public review period, and Fort Benning's needs. Based on these factors, I have decided to implement Proposed Alternative 1 (Preferred Alternative) at Fort Benning by allowing Georgia Power, through a utilities easement, to design, construction, operation, and maintenance of a 30MW solar PV facility. Implementation of the Preferred Alternative will not have a significant impact on the quality of human life or natural environment.

This analysis fulfills the requirements of NEPA, as implemented by the Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508), as well as the requirements of the Environmental Analysis of Army Actions (32 CFR 651). Therefore, issuance of a FNSI is warranted and an Environmental Impact Statement (EIS) is not necessary.

FINDING OF NO SIGNIFICANT IMPACT
REVIEWED AND APPROVED BY:

10 Sep 2014
Date



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